

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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STEVEN FRIEDMAN,	:
	:
Plaintiff,	:
	:
-against-	:
	:
COLETTE CHESTNUT, in her representative capacity,	: 19 Civ. 226 (PKC)
MICHAEL KOOPER, STACEY LIPPMAN, CHIAT-	:
DAY HOLDINGS INC. EMPLOYEE PROFIT	:
SHARING AND 401(K) PLAN, a/k/a CHIAT-DAY	:
HOLDINGS INC. PROFIT SHARING PLAN, and	:
TBWA WORLDWIDE INC.,	:
	:
Defendants.	:
-----	x

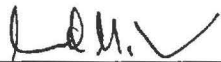
**DEFENDANT MICHAEL KOOPER'S NOTICE OF
MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

PLEASE TAKE NOTICE that upon the annexed declaration of Edward M. Spiro, dated April 5, 2019, the exhibit attached thereto, and Defendant Michael Kooper's Memorandum of Law in Support of His Motion to Dismiss Plaintiff's Complaint, Defendant Michael Kooper shall move this Court before the Honorable P. Kevin Castel on a date and time to be designated by this Court, for an order (1) dismissing the Complaint with prejudice as to Mr. Kooper pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure on the ground that Plaintiff fails to state a claim upon which relief can be granted, and (2) awarding such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's scheduling order dated March 21, 2019, opposing papers must be served by April 29, 2019.

Dated: New York, New York
April 5, 2019

MORVILLO ABRAMOWITZ GRAND
IASON & ANELLO P.C.

By: 
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